

# Responsible Care® Verification Report

***NorFalco (A Glencore Company)***

October 28 - 29, 2020



**CHEMISTRY INDUSTRY  
ASSOCIATION OF CANADA**



**Responsible Care®**  
Our commitment to sustainability.



## **Disclaimer**

This report has been produced by a team, convened by the Chemistry Industry Association of Canada (CIAC), to provide advice to the member-company and assist it in meeting its Responsible Care<sup>®</sup> commitments. The material in this report reflects the team's best judgment in light of the information available to it at the time of preparation. It is the responsibility of the CIAC member-company that is the subject of this report to interpret and act on the report's findings and recommendations as it sees fit. Any use which a third party makes of this document, or any reliance on the document or decisions made based upon it, are the responsibility of such third parties. Although CIAC members are expected to share the results of this guidance document with interested parties, the Association, its member-companies, their employees, consultants and other participants involved in preparing the document accept no responsibility whatsoever for damages, if any, suffered by a third party as a result of decisions made or actions based on this report.

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## EXECUTIVE SUMMARY

The eighth NorFalco verification was conducted, via the WEBEX platform, as a virtual verification beta test. The planning and organizational meeting took place on September 16<sup>th</sup>, 2020 and the Executive Contact interview was held on September 17<sup>th</sup>, 2020. The virtual verification was conducted on October 28<sup>th</sup> and 29<sup>th</sup> 2020. Third party service providers and one customer were interviewed on November 4<sup>th</sup> through November 6<sup>th</sup>, 2020.

NorFalco is a merchant marketer of bulk sulphuric acid and does not own any physical assets for the production, storage, or distribution of sulphuric acid.

The focus of the verification was mainly the administration of Stewardship and Accountability Codes. However, there are sections of the Operations Code that pertain to NorFalco operations and those management systems were also reviewed during the verification process.

As a result of the verification conducted, the verification team is of the opinion that the Responsible Care Ethic and Principles for Sustainability are guiding company decisions and actions, and that a self-healing management system is in place to drive continual improvement.

The team has identified two Findings Requiring Action, one Works in Progress, six Opportunities for Improvement and ten Successful Practices.

The team believes that NorFalco has the management systems in place to address the Findings Requiring Action and summarized in this Executive Summary and described in detail in this report.

This verification has been completed and no further involvement is required by the verification team.

Signed:



Verification Team Leader

Date: December 4, 2020

For more information on this or a previous Responsible Care Verification Report, please contact your local company site or the company's overall Responsible Care coordinator:

Jocelyn Arcouette  
Manager, Quality Assurance,  
James Cooper.  
Technical and Risk Management Representative.  
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## SUMMARY OF VERIFICATION TEAM OBSERVATIONS

### Findings Requiring Action:

1. It is a Finding Requiring Action (#1) to review the expectations of AC145 regarding “the right to understand” and develop a management system to address this expectation based on the resources available to NorFalco. (AC145).
2. It is a Finding Requiring Action (#2) to review the expectations of the Operations Code elements noted here and develop management systems to address the expectations of Safety and Security in the office environment. (OP22, 25, 48) specifically:
  - a) a Contractor Safety Management System
  - b) procedures (both specific to NorFalco employees and in conjunction with the building management company) that address:
    - i. an active shooter,
    - ii. bomb threats. (in conjunction with city police)
    - iii. domestic violence in the workplace, etc.

### Works in Progress:

1. NorFalco identified of the need to update the Training and Informational documents provided to third parties. This has been noted as a Work in Progress.

### Improvement Opportunities:

1. There is an Improvement Opportunity to develop a management system based on “safety alerts” whereby third parties are provided information on industry incidents and the corresponding recommended corrective action(s). The management system would require third parties to respond to the alert citing if the events were relevant to their operations and corrective actions implemented. (OP20, 21, 56)
2. There is an Opportunity for Improvement to a) ensure discussions with third parties include the NorFalco commitment to promote Product Stewardship Code best practices in the context of sustainability and managing risk for the betterment of society, the environment, and the economy. And b) ensure that third party business contracts, where practical, establish Stewardship Codes as a contractual agreement and display the verbiage “Responsible Care”. (ST102, 115)
3. There is an Opportunity for Improvement to modify the NorFalco website to include a contact portal for public “complaints or inquiries”. (AC130)
4. There is an Opportunity for Improvement to develop or modify an existing management system to ensure periodic contact with MPs and or MPPs as a method to promote Responsible Care and the NorFalco management systems that support safe handling, transportation, and distribution of NorFalco products in their respective geographic areas. (AC136)
5. There is an Opportunity for Improvement to identify “Responsible Care” as a component of job descriptions and responsibilities for NorFalco employees. (Senior Trading Team, etc.)
6. There is an Improvement Opportunity to modify the management system related to the Employee Handout section of the Glencore Emergency Response Reference Manual to require that this handout be displayed, at all times, in a prominent employee location and reviewed during each building emergency drill. (OP23)

#### Successful Practices:

1. The verification team notes as a Successful Practice the NorFalco management system for continuous safety improvements in rail car design.
2. The verification team notes as a Successful Practice the NorFalco Dislocation Policy related to potential community disruptions during an emergency incident involving NorFalco third party carriers and products.
3. The team notes as a Successful Practice the Glencore Business Continuity Plan.
4. The verification team notes as a Successful Practice the NorFalco management system that utilizes a comprehensive “Customer First Order” information package.
5. The verification team notes as a Successful Practice the NorFalco management system that utilizes a third party Know Your Customer audit process for new customers.
6. The verification team notes as a Successful Practice the NorFalco marketing philosophy of “*More Than H<sub>2</sub>SO<sub>4</sub>*” which encompasses industry leading Responsible Care standards.
7. The verification team notes as a Successful Practice the 2018 “Grand Slam” award by the Association of American Railroads for the safe shipping of Sulphuric Acid.
8. The verification team notes as a Successful Practice the NorFalco management system for Motor Carrier Recognition that subsequently awarded two third party motor carriers with NorFalco's Motor Carrier of the Year Award for leadership in safety and performance for 2018.
9. The verification team noted as a Successful Practice the NorFalco response to the COVID-19 pandemic and their transition to work from home thus recognizing as a prime concern the health and safety of their employees. The senior management went the extra mile in ensuring that support was available to any employee or their family that was struggling in meeting the demands of work-from-home.
10. The verification team noted as a Successful Practice the completion of NorFalco's eighth verification as the Chemistry Industry Association of Canada beta test for virtual verifications. The company participants were engaged and well informed. Documentation supplied pre- and post-verification interview meetings were complete and supplied in a timely manner.

## INTRODUCTION

### About Responsible Care Verification

#### ***The Responsible Care® Ethic and Principles for Sustainability***

*We are committed to do the right thing and be seen to do the right thing.*

*We dedicate ourselves, our technology and our business practices to sustainability - the betterment of society, the environment and the economy. The principles of Responsible Care® are key to our business success, and compel us to:*

- work for the improvement of people's lives and the environment, while striving to do no harm.
- be accountable and responsive to the public, especially our local communities, who have the right to understand the risks and benefits of what we do.
- take preventative action to protect health and the environment.
- innovate for safer products and processes that conserve resources and provide enhanced value.
- engage with our business partners to ensure the stewardship and security of our products, services and raw materials throughout their lifecycles.
- understand and meet expectations for social responsibility.
- work with all stakeholders for public policy and standards that enhance sustainability, act to advance legal requirements and meet or exceed their letter and spirit.
- promote awareness of Responsible Care and inspire others to commit to these

As a member of the Chemistry Industry Association of Canada (CIAC), the most senior executive responsible for NorFalco operations in Canada attests annually to CIAC and its peers that the company's operations conform to the expectations contained in the Responsible Care Commitments and are guided by *Responsible Care Ethic and Principles for Sustainability*.

As an element of this commitment to Responsible Care, NorFalco must, every three years, participate in an external verification intended to:

1. Provide the Executive Contact with an external perspective when assessing if the company is indeed meeting the intent of the Responsible Care Commitments, along with advice on areas that may require attention.
2. Identify opportunities for assisting the company when benchmarking its own practices and performance against those of its peers, thus supporting continual improvement.;
3. Contribute to the credibility of Responsible Care amongst company personnel and stakeholders, as well as the stakeholders of the broader industry.
4. Identify successful company practices that can be promoted to peers in the CIAC membership; and
5. Support the identification of areas of common weakness so that collective tools and guidance can be developed to improve performance in those areas across the CIAC membership.

Verification is conducted according to a common protocol, developed by the association's members and others, including several critics of the chemical industry. The verification is conducted by a team consisting of:

- Knowledgeable industry experts with experience in Responsible Care.
- A representative of the public at large (usually with a public interest background and with experience in Responsible Care gained from serving on the CIAC's National Advisory Panel)

- One or more representatives of the local communities where the company's facilities are located.

Once completed, the Verification Report is made publicly available through the CIAC website ([www.canadianchemistry.ca](http://www.canadianchemistry.ca)). NorFalco is also expected to share the report with interested persons in its communities and other stakeholders as part of its ongoing dialogue processes.

Additional information on Responsible Care and / or the verification process can be found at the CIAC website [www.canadianchemistry.ca](http://www.canadianchemistry.ca), or by contacting the Director Responsible Care at CIAC [glaurin@canadianchemistry.ca](mailto:glaurin@canadianchemistry.ca) (613) 237 6215 extension 233.

The verification team was comprised of the following individuals.

Name	Affiliation	Representing
Cameron Dillabough	CIAC	<i>Team Leader</i>
Debbie Krukowski	CIAC	<i>The Community at Large</i>
Larry Masaro	CIAC	<i>Verifier (observer)</i>
Shannon Watt	Vice-President of Sustainability	<i>CIAC (observer)</i>

#### About NorFalco:

NorFalco, a Glencore Company, is one of the largest marketers of sulphuric acid in North America. Glencore worldwide produces approximately 8 million tons of acid annually of which NorFalco markets approximately 1.6 million tons in North America, which is produced at five acid plants situated within three metallurgical smelters in Eastern Canada. With offices in Toronto, ON and New York, NY NorFalco maintains a fully integrated network of railcars, tank trucks, storage tanks, terminals, and seaborne vessels.

From its inception, the NorFalco marketing and service credo has been “More than H<sub>2</sub>SO<sub>4</sub>” which underpins their commitment to the CIAC Responsible Care Ethic.

#### About This Verification

The 2020 verification of NorFalco was conducted on a virtual platform and served as a beta test for a future CIAC virtual verification protocol. The NorFalco WEBEX virtual platform was utilized by the company and the verification team.

The planning and organization meetings were held on September 16<sup>th</sup>, and the Executive Contact interview on September 17<sup>th</sup>. The verification virtual visit and interviews were conducted on October 28<sup>th</sup> and 29<sup>th</sup> and the exit meeting was held on November 9<sup>th</sup>.

### TEAM OBSERVATIONS CONCERNING THE RESPONSIBLE CARE COMMITMENTS (CODES AND BENCHMARK AND COLLECTIVE EXPECTATIONS)

#### TEAM OBSERVATIONS CONCERNING THE OPERATIONS CODE

As noted previously, NorFalco is marketer of sulphuric acid and as such does not have physical manufacturing, storage or distribution assets. However, there are aspects of the Operations Code that do apply.

For the most part, current company Operations Code management systems support Responsible Care expectations. However, the team has listed one Finding Requiring Action and two Opportunities for Improvement that will result in a more comprehensive approach to these commitments.

It is a Finding Requiring Action (#2) to review the expectations of the Operations Code elements noted and develop management systems to address the expectations of Safety and Security in the office environment. (OP22, 23, 24, 25) specifically:

- a) a Building Service Contractor Safety Management System.
- b) procedures (both specific to NorFalco employees and in conjunction with the building management company) that address:
  - i. an active shooter,
  - ii. bomb threats. (in conjunction with city police)
  - iii. domestic violence in the workplace, etc. (OP48)

There is an Opportunity for Improvement (#1) to develop a management system based on “safety alerts” whereby third parties are provided information on industry incidents and the corresponding recommended corrective action(s). The management system would require third parties to respond to the alert citing if the events were relevant to their operations and corrective actions implemented. (OP20, 21, 56)

There is an Opportunity for Improvement (#6) to modify the management system related to the Employee Handout section of the Glencore Emergency Response Reference Manual to require that this handout be displayed, at all times, in a prominent employee location and reviewed during each building emergency drill. (OP23)

There is an Opportunity for Improvement (#5) to identify “Responsible Care” as a component of job descriptions and responsibilities for NorFalco employees. (Senior Trading Team, etc.)

#### Malicious Intent

There is a management system in place to protect the NorFalco product from malicious intent during loading, shipping, unloading and storage. There is also an appropriate management system to address malicious intent related to electronic data supporting NorFalco operations. A third-party C-TPAT audit, including reviews of facilities, product, and shipping security, was successfully conducted in June 2019. The team has listed an operations code finding (#2) that includes response to malicious intent within the confines of the Canadian office of NorFalco.

#### Resource Conservation

Because of the business model utilized by NorFalco, they are limited in the application of this code element. However, the Canadian office does have in-place office related recycling programs. The parent company Glencore does have initiatives and objectives in relation to reducing resource consumption in areas such as water and energy.

NorFalco does promote resource conservation with third party service providers and the two motor carrier companies interviewed by the verification team did have advanced conservation and recycling management systems for fuel consumption and the recycling of equipment and related parts. There is also a NorFalco management system, supported by Glencore, to monitor and react to changes in product properties and usage that might adversely affect the natural environment.

#### Promotion of Responsible Care by Name

There is a management system in place to support this Responsible Care Commitment. “Responsible Care” or the world recognized Responsible Care logo is displayed on third party business contracts and the NorFalco and Glencore websites. NorFalco’s commitment to the Responsible Care values is emphasized during meetings and presentations to the public, customers, and third-party service providers.



The verification team has noted one Opportunity for Improvement to the management system by ensuring that Responsible Care name recognition is provided throughout the entire value chain. The verification team also noted as a Successful Practice the entire NorFalco business credo of “*MORE* than H<sub>2</sub>SO<sub>4</sub>”.

There is an Opportunity for Improvement (#2) to a) ensure discussions with third parties include the NorFalco commitment to promote Product Stewardship Code best practices in the context of sustainability and managing risk for the betterment of society, the environment, and the economy. And b) ensure that third party business contracts, where practical, establish Stewardship Codes as a contractual agreement and display the verbiage “Responsible Care”. (ST102, 115)

The verification team judges as a Successful Practice (#6) the NorFalco marketing philosophy of “*More Than H<sub>2</sub>SO<sub>4</sub>*” which encompasses industry leading Responsible Care standards.

#### TEAM OBSERVATIONS CONCERNING STEWARDSHIP CODE

There is a comprehensive management system in place to address the Responsible Care Commitments that pertain to product stewardship.

As the largest shipper of sulphuric acid in North America, the company focus is on safe, incident free operations. An additional focus is on equipment design and to that end several safe operational innovations have been implemented by the company in the design of railcars and roadway tank wagons. As an example, improvements have been made in tank car shell thickness and the design, positioning and protection of the service equipment.

#### TEAM OBSERVATIONS CONCERNING ACCOUNTABILITY CODE

There is a management system in place to support with the Responsible Care expectations pertaining to the Accountability Code. Because of the resources available to NorFalco, some Accountability Code action plans are accomplished through the parent Company Glencore, the CIAC and or professional groups such as The Sulphur, and Fertilizer Institutes. NorFalco is an active participant in CIAC TRANSCAER activities, and as such, fulfill their commitment to communicate potential product transportation related hazards to emergency responders and the public along transportation routes.

The verification team has noted one Finding Requiring Action and two Opportunities for Improvement related to the Accountability Code which focus on ensuring product hazard information and potential raw material residual effects on products are available to those “with a right to understand” throughout the value chain. Providing contact information on the NorFalco website for the public and developing an action plan for regular contact with the appropriate elected officials.

It is a Finding Requiring Action (#1) to review the expectations of AC145 regarding “the right to understand” and develop a management system to address this expectation based on the resources available to NorFalco. (AC145)

There is an Opportunity for Improvement (#3) to modify the NorFalco website to include a portal for public “complaints or inquiries”. (AC130)

There is an Opportunity for Improvement (#4) to develop or modify an existing management system to ensure periodic contact with MPs and or MPPs as a method to promote Responsible Care and the NorFalco management systems that support safe handling, transportation, and distribution of NorFalco products in their respective geographic areas. (AC136)

#### APPENDICES TO CODES: SOCIAL RESPONSIBILITY

As a function of the parent company, sustainability focus Glencore has created a “Community Super Fund”. In 2020, the fund allocated NorFalco money to provide aid to the charities of their choice in their local community.

NorFalco has chosen “Food Share” a local Toronto food bank, “Feed Ontario” a wider network of food banks and the Canadian Woman’s Foundation.

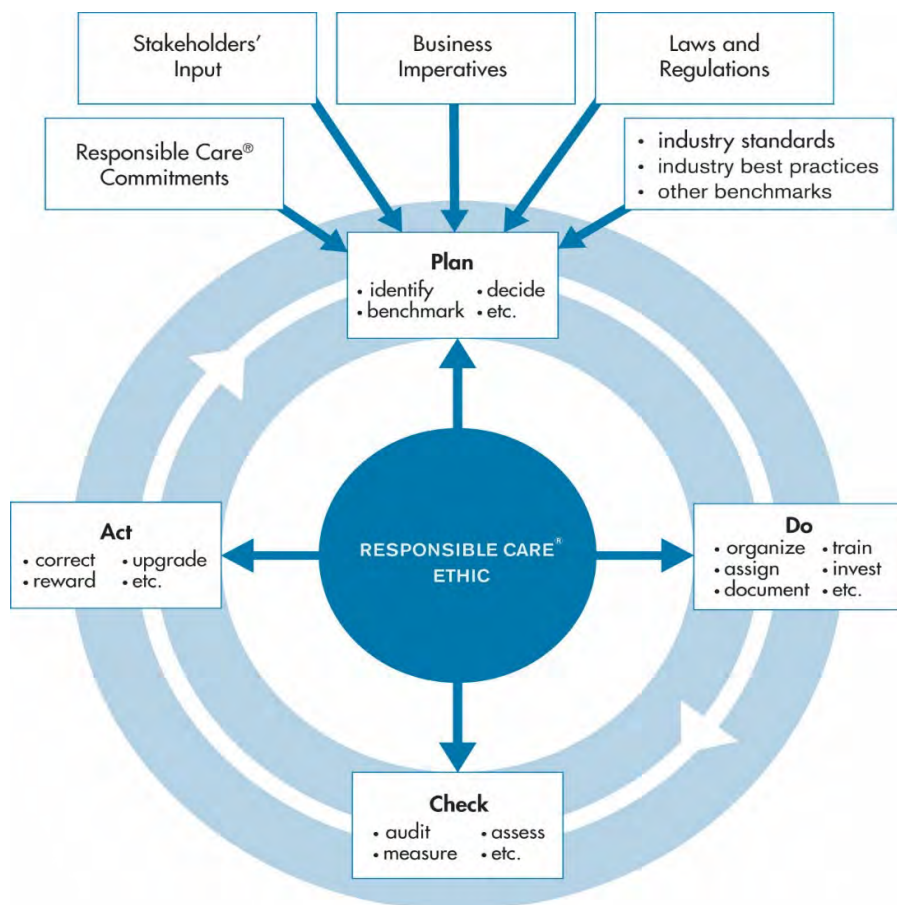
#### APPENDICES TO CODES: INVOLVEMENT IN PUBLIC POLICY PROCESS

The NorFalco methodology for involvement in the public process is through membership in third party professional groups and associations with their focus being the CIAC, The Sulphur Institute and The Fertilizer Institute. Elected officials have been consulted in the past but mainly because of issues affecting NorFalco from a business perspective.

The verification team has listed an Opportunity for Improvement, under the Accountability Code, to develop a management system that provides a structured approach to regular contact with elected officials that represent the constituencies where Glencore facilities are located.

#### TEAM OBSERVATIONS ON THE COMPANY MANAGEMENT SYSTEM

There is an effective management system in place at NorFalco structured on the schematic shown on page 14 below. The management system depicted by the schematic is a CIAC requirement of member companies as a methodology to ensure continual improvement in the commitment to Responsible Care. As a verbal comment, the team would recommend NorFalco incorporate specific Responsible Care references in the schematic developed to describe the NorFalco management system.





*WORK FOR THE IMPROVEMENT OF PEOPLE'S LIVES AND THE ENVIRONMENT, WHILE STRIVING TO DO NO HARM:*

Sulphuric Acid is used in many applications and process, which can potentially have a direct or indirect positive impact on people's lives. Reference: <https://www.norfalco.com/en/products-services/Pages/overview.aspx>

*BE ACCOUNTABLE AND RESPONSIVE TO THE PUBLIC, ESPECIALLY OUR LOCAL COMMUNITIES, WHO HAVE THE RIGHT TO KNOW THE RISKS AND BENEFITS OF WHAT WE DO:*

- i) NorFalco hosts two safety and technical seminars each year. The target audiences are customers (product end users), the public, rail carriers, motor carriers and emergency response professionals.
- ii) NorFalco participates in the CIAC TRANSCAER program and as part of that commitment was scheduled to host in April 2020 a Safety and Technical seminar at the FESTI (Fire and Emergency Services Training Institute) with a focus on emergency response to transportation incidents involving sulphuric acid. Unfortunately, due to the COVID-19 pandemic this event was canceled. NorFalco, in conjunction with FESTI, plan to hold this event when COVID-19 pandemic meeting restrictions are removed.
- iii) NorFalco risk guideline documents and customer sales contracts require service providers, such as storage terminals, to have an active role in providing local emergency planning committees with the appropriate product awareness information.

*TAKE PREVENTATIVE ACTION TO PROTECT HEALTH AND THE ENVIRONMENT:*

- i) The sulphuric acid marketed by NorFalco is manufactured from sulphur dioxide removed from metal smelting processes owned by parent company Glencore. Sulphur dioxide is an air pollutant and a main contributor to "acid rain". Removal of this pollutant has greatly contributed to improvements in air and water quality.
- ii) NorFalco has dedicated emergency response protocols. There are also dedicated emergency response resources at Glencore smelter facilities that will respond to emergencies regarding sulphuric acid in Ontario and Quebec. NorFalco also retains a third-party emergency response provider (GFL) who responds to emergencies in the Maritimes and western provinces. In the United States, emergency response capabilities are provided by SPSI.
- iii) NorFalco adheres to the code of conduct and assurance commitments of parent company Glencore.

*INNOVATE FOR SAFER PRODUCTS AND PROCESSES THAT CONSERVE RESOURCES AND PROVIDE ENHANCED VALUE:*

NorFalco markets and distributes 93.5 to 99.5 % sulphuric acid produced from a smelting process waste product. Reference: <https://www.norfalco.com/en/productsservices/Pages/overview.aspx>

*ENGAGE WITH OUR BUSINESS PARTNERS TO ENSURE THE STEWARDSHIP AND SECURITY OF OUR PRODUCTS, SERVICES AND RAW MATERIALS THROUGHOUT THEIR LIFE CYCLES:*

- i) NorFalco maintains a comprehensive product stewardship and risk management systems that comply with the CIAC Responsible Care Commitments, which include contractual agreements with third parties and customers. Also included are dedicated technical and quality assurance resources.
- ii) NorFalco conducts safety and technical seminars for customers and third-party service providers.
- iii) NorFalco operations are governed by the Glencore Corporate Codes of Conduct.

***UNDERSTAND AND MEET EXPECTATIONS FOR SOCIAL RESPONSIBILITY:***

i) As part of the Glencore Global Community Support Fund the NorFalco charitable focus has been “Food Share” a Toronto food bank, “Feed Ontario” a province wide food bank network and the Canadian Woman’s Foundation dedicated to addressing poverty and violence issues effecting women and young girls.

ii) The NorFalco product and services risk management guidelines and their safety and technical seminars constitute a response to current social responsibility expectations.

iii) NorFalco third party business contracts include a social responsibility expectation of said third parties.

***WORK WITH ALL STAKEHOLDERS FOR PUBLIC POLICY AND STANDARDS THAT ENHANCE SUSTAINABILITY, ACT TO ADVANCE LEGAL REQUIREMENTS AND MEET OR EXCEED THEIR LETTER AND SPIRIT:***

i) NorFalco is an active member of the CIAC and participates in two CIAC leadership groups, the CIAC TRANSCAER risk training and communication initiatives, the CIAC sponsored Multi-Industry Committee on the Transportation of Dangerous Goods and in addition, two industry associations (the Sulfur Institute & The Fertilizer Institute) which work to promote the initiatives described in this Responsible Care Commitment.

ii) NorFalco Risk Management System provides guidance in creating industry standards that exceed regulatory requirements for railcar outer shell thickness and loading and vent valve protection.

iii) NorFalco utilizes a third-party audit process entitled “Know Your Customer” prior to the initial shipment of sulphuric acid.

***PROMOTE RESPONSIBLE CARE® AND INSPIRE OTHERS TO COMMIT TO THESE PRINCIPLES:***

There is a NorFalco management system in place to support this Responsible Care expectation. Business contracts with third party service providers require that they conduct their business in a manner that supports the NorFalco Responsible Care commitment. In addition, the term “Responsible Care” is a component of NorFalco’s verbal and electronic communication with customers and third-party service providers.

**VERIFICATION TEAM CONCLUSION**

As a result of the examination conducted and the observations communicated within this report, the verification team, is of the opinion that the Responsible Care Ethic and Principles for Sustainability are guiding company decisions and actions, and that a self-healing management system is in place to drive continual improvement. The team believes that the company can respond to the range of Findings Requiring Action identified during the verification, as summarized in the Executive Summary, and discussed in detail in the report.

This verification has been completed and no further involvement is required by the verification team.



**COMPANY RESPONSE TO VERIFICATION REPORT**

On behalf of NorFalco, I have reviewed this verification report. The observations and conclusions contained in the report have been discussed with the verification team.

We thank the verification team for conducting a thorough review of our processes; for providing recommendations for continuous improvement; and for preparing the report very promptly following the verification visit. We are pleased with the outcome of this verification and appreciate many positive comments the verification team shared with NorFalco personnel. We further appreciate that the Reverification Team identified ten Successful Practices and verified that NorFalco is aligned with the ethic of Responsible Care.

NorFalco will communicate the results of the verification exercise with its CIAC peers at their next meeting and will discuss the verification results with our stakeholders.

We will give consideration to the “Works In Progress” and “Improvement Opportunities” identified by verification team and will assist the CIAC in communicating and sharing the identified “Successful Practices” to other CIAC members. Our progress in implementing those plans will be discussed when preparing our Annual Statement of Re-Commitment to Responsible Care and communicated to the verification team at the time of our next verification.

Sincerely,

Tom Hobbs  
Executive Senior Vice President  
NorFalco

## INTERVIEW LISTS

## A: Company Personnel Contacted During Verification Process

NAME	POSITION	LOCATION
James Cooper	Technical and Risk Management Representative	Toronto
Jocelyn Arcouette	Technical and Risk Management Team Leader	New York
Marie- France Rollin	Technical and Risk Management Representative	Toronto
Yves Gilbert	Technical and Risk Management Representative	Toronto
Tom Hobbs	Executive SR VP	New York
Eitan Schwartz	VP of Commercial	New York

## B: External Stakeholders Contacted During Verification Process

NAME	POSITION	LOCATION
Tracy Giddens	Vice President Howard Sheppard Inc. (trucking)	
John Claxton	Operations Manager Howard Sheppard Inc.	
John Knudson	Sales Manager RST Industries Transportation Services. (trucking)	
Chris Haines	Director of Operations (RST)	
Sean Reilly, CRSP, CDS	Director, HSSE and Emergency Response (RST)	
Shaune Zeleny	Regional Mgr. Specialized Services & Emergency Response Western Region, GFL Environmental	
Steve Ten Doeschate	Plant Manager Kawartha Ethanol Inc.	







**Responsible Care<sup>®</sup>**  
Our commitment to sustainability.

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